

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN,

Plaintiff,

vs.

TRACY DEEBBS-ELKENANEY P/K/A

TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

DECLARATION OF CECE M. COLE

CeCe M. Cole declares as follows:

1. I am an associate with Cowan, DeBaets, Abrahams, & Sheppard LLP, attorneys for defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, and Universal City Studios LLC in the above-captioned matter. I make this declaration in support of all Defendants' reply in support of motion for summary judgment on the copyright claims and supplemental motion regarding evidentiary issues.

2. Attached hereto as Exhibit GG are true and correct excerpts of Dr. Chaski's deposition transcript, which was taken on September 28, 2023 in connection with this action.

3. Attached hereto as Exhibit HH are true and correct excerpts of Plaintiff's deposition transcript, which was taken on March 24, 2023 in connection with this action.

4. Attached hereto as Exhibit II are true and correct excerpts of Tracy Wolff's deposition transcript, which was taken on March 7, 2023 in connection with this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 28, 2024
New York, New York


CeCe M. Cole